

EXHIBIT 3

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE: TERRORIST ATTACKS : 03-MDL-1570
ON SEPTEMBER 11, 2001 : (GBD) (SN)

- - -

APRIL 27, 2021
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Remote Videotaped

Deposition, taken via Zoom, of JOHN
SIDEL, commencing at 7:02a.m., on the
above date, before Amanda
Maslynsky-Miller, Certified Realtime
Reporter and Notary Public in and for the
Commonwealth of Pennsylvania.

- - -

GOLKOW LITIGATION SERVICES
877.370.3377 ph| 917.591.5672 fax
deps@golkow.com

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<p>1 APPEARANCES:</p> <p>2</p> <p>3 KREINDLER & KREINDLER LLP</p> <p>4 BY: ANDREW J. MALONEY III, ESQUIRE</p> <p>5 750 Third Avenue</p> <p>6 New York, New York 10017</p> <p>7 (212) 687-8181</p> <p>8 amaloney@kreindler.com</p> <p>9 Representing the Ashton, et al.,</p> <p>10 Plaintiffs</p> <p>11</p> <p>12 COZEN O'CONNOR P.C.</p> <p>13 BY: SEAN P. CARTER, ESQUIRE</p> <p>14 BY: J. SCOTT TARBUTTON, ESQUIRE</p> <p>15 One Liberty Place</p> <p>16 1650 Market Street</p> <p>17 Suite 2800</p> <p>18 Philadelphia, Pennsylvania 19103</p> <p>19 (215) 665-2000</p> <p>20 scarter1@cozen.com</p> <p>21 starbutton@cozen.com</p> <p>22 Representing the Plaintiffs</p> <p>23</p> <p>24 ANDERSON KILL P.C.</p> <p>25 BY: BRUCE STRONG, ESQUIRE</p> <p>26 1251 Avenue of the Americas</p> <p>27 New York, New York 10020</p> <p>28 (212) 278-1000</p> <p>29 bstrong@andersonkill.com</p> <p>30 Representing the Plaintiffs'</p> <p>31 Steering Committee</p> <p>32</p> <p>33</p> <p>34</p>	<p>1 APPEARANCES: (Continued)</p> <p>2</p> <p>3 LEWIS BAACH KAUFMANN MIDDLEMISS PLLC</p> <p>4 BY: WALEED NASSAR, ESQUIRE</p> <p>5 BY: AISHA E.R. BEMBRY, ESQUIRE</p> <p>6 BY: SUMAYYA KHATIB, ESQUIRE</p> <p>7 1101 New York Avenue, N.W.</p> <p>8 Suite 1000</p> <p>9 Washington, DC 20005</p> <p>10 (202) 833-8900</p> <p>11 waleed.nassar@lbkmlaw.com</p> <p>12 aisha.bembry@lbkmlaw.com</p> <p>13 sumayya.khatib@lbkmlaw.com</p> <p>14 Representing the Defendants,</p> <p>15 Muslim World League, the</p> <p>16 International Islamic Relief</p> <p>17 Organization, and</p> <p>18 Drs. Turki, Al-Obaid, Naseef and Basha</p> <p>19</p> <p>20 LAW FIRM OF OMAR T. MOHAMMEDI, LLC</p> <p>21 BY: JOSHUA MORRISON, ESQUIRE</p> <p>22 BY: STEVE SEIGLER, ESQUIRE</p> <p>23 233 Broadway</p> <p>24 Suite 820</p> <p>25 New York, New York 10279</p> <p>26 (212) 725-3846</p> <p>27 jmorrisson@otmlaw.com</p> <p>28 sseigler@otmlaw.com</p> <p>29 Representing the Defendant,</p> <p>30 WAMY and WAMY International</p> <p>31</p> <p>32 ALSO PRESENT:</p> <p>33 David Lane, Videographer</p> <p>34 Zac Hone, Trial Technician</p> <p>35</p> <p>36 Raymond Rivera, IT, Cozen O'Connor</p> <p>37</p> <p>38 Nour Subani, Paralegal, Lewis Baach Kaufman</p> <p>39 Middlemiss PLLC</p> <p>40</p>
Page 3	Page 5
<p>1 APPEARANCES: (Continued)</p> <p>2</p> <p>3</p> <p>4 MOTLEY RICE LLC</p> <p>5 BY: ROBERT T. HAEFELE, ESQUIRE</p> <p>6 BY: JADE A. HAILESELIASSIE, ESQUIRE</p> <p>7 BY: JODI WESTBROOK FLOWERS, ESQUIRE</p> <p>8 28 Bridgeside Boulevard</p> <p>9 Mount Pleasant, South Carolina 29464</p> <p>10 (843) 216-9000</p> <p>11 rhaefe@motleyrice.com</p> <p>12 jhailesealiassie@motleyrice.com</p> <p>13 jflowers@motleyrice.com</p> <p>14 Representing the Plaintiffs' Steering</p> <p>15 Committee and the Burnett Plaintiffs</p> <p>16</p> <p>17 JONES DAY</p> <p>18 BY: ERIC SNYDER, ESQUIRE</p> <p>19 BY: STEVEN COTTREAU, ESQUIRE</p> <p>20 BY: ABIGAIL BOSCH, ESQUIRE</p> <p>21 51 Louisiana Avenue, N.W.</p> <p>22 Washington, D.C. 20001</p> <p>23 (202) 879-3939</p> <p>24 esnyder@jonesday.com</p> <p>25 scottreau@jonesday.com</p> <p>26 abosch@jonesday.com</p> <p>27 Representing the Defendant,</p> <p>28 Dubai Islamic Bank</p> <p>29</p> <p>30</p> <p>31</p> <p>32</p> <p>33</p> <p>34</p>	<p>1 - - -</p> <p>2 I N D E X</p> <p>3 - - -</p> <p>4</p> <p>5 Testimony of: JOHN SIDEL</p> <p>6 By Mr. Carter 9</p> <p>7</p> <p>8 - - -</p> <p>9 E X H I B I T S</p> <p>10 - - -</p> <p>11 NO. DESCRIPTION PAGE</p> <p>12 Sidel-597 No Bates</p> <p>13 Notice of Oral Deposition</p> <p>14 of John Sidel 12</p> <p>15 Sidel-598 No Bates</p> <p>16 Expert Report of Professor</p> <p>17 John Sidel 15</p> <p>18 Sidel-599 No Bates</p> <p>19 Parliament Motion, Saudi</p> <p>20 Arabia and The School of</p> <p>21 Oriental and African</p> <p>22 Studies 36</p> <p>23 Sidel-600 No Bates</p> <p>24 Excerpts, 9/11 Commission</p> <p>Report 53</p> <p>Sidel-601 FED-PEC0237854-7873</p> <p>RAND Corporation Testimony 64</p> <p>Sidel-602 FED-PEC0202113-2132</p> <p>Department of the Treasury</p> <p>Memorandum 84</p>

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<p>1 - - -</p> <p>2 EXHIBITS</p> <p>3 - - -</p> <p>4 NO. DESCRIPTION PAGE</p> <p>5 Sidel-603 FED-PEC0173851-3854</p> <p>6 State Department Diplomatic</p> <p>7 Cable 85</p> <p>8 Sidel-604 No Bates</p> <p>9 Seeds of Terror,</p> <p>10 Maria Ressa 92</p> <p>11 Sidel-605 No Bates</p> <p>12 Excerpts, 9/11 Commission</p> <p>13 Report 109</p> <p>14 Sidel-606 No Bates</p> <p>15 Michael Scheuer, Osama bin</p> <p>16 Laden, Excerpts 111</p> <p>17 Sidel-607 No Bates</p> <p>18 9/11 Commission Report 156</p> <p>19 Sidel-608 No Bates</p> <p>20 Sidel Invoices 187</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p>1 - - -</p> <p>2 (It is hereby stipulated and</p> <p>3 agreed by and among counsel that</p> <p>4 sealing, filing and certification</p> <p>5 are waived; and that all</p> <p>6 objections, except as to the form</p> <p>7 of the question, will be reserved</p> <p>8 until the time of trial.)</p> <p>9 - - -</p> <p>10 VIDEO TECHNICIAN: We are</p> <p>11 now on the record. My name is</p> <p>12 David Lane, videographer for</p> <p>13 Golkow Litigation Services.</p> <p>14 Today's date is April 27th, 2021.</p> <p>15 Our time is 7:02 a.m. Eastern</p> <p>16 Standard Time.</p> <p>17 This remote video deposition</p> <p>18 is being held in the matter of</p> <p>19 Terrorist Attacks on September</p> <p>20 11th, 2001. Our deponent today is</p> <p>21 Professor John Sidel.</p> <p>22 All parties to this</p> <p>23 deposition are appearing remotely</p> <p>24 and have agreed to the witness</p>
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<p>1 - - -</p> <p>2 DEPOSITION SUPPORT INDEX</p> <p>3 - - -</p> <p>4</p> <p>5 Direction to Witness Not to Answer</p> <p>6 Page Line Page Line Page Line</p> <p>7 None</p> <p>8</p> <p>9</p> <p>10 Request for Production of Documents</p> <p>11 Page Line Page Line Page Line</p> <p>12 None</p> <p>13</p> <p>14</p> <p>15 Stipulations</p> <p>16 Page Line Page Line Page Line</p> <p>17 8 1</p> <p>18</p> <p>19</p> <p>20 Question Marked</p> <p>21 Page Line Page Line Page Line</p> <p>22 None</p> <p>23</p> <p>24</p>	<p>1 being sworn in remotely.</p> <p>2 Due to the nature of remote</p> <p>3 reporting, please pause briefly</p> <p>4 before speaking to ensure all</p> <p>5 parties are heard completely.</p> <p>6 Counsels' appearances will</p> <p>7 be noted on the stenographic</p> <p>8 record. The court reporter today</p> <p>9 is Amanda Miller and will now</p> <p>10 swear in the witness.</p> <p>11 - - -</p> <p>12 JOHN SIDEL, after having</p> <p>13 been duly sworn, was examined and</p> <p>14 testified as follows:</p> <p>15 - - -</p> <p>16 VIDEO TECHNICIAN: Please</p> <p>17 begin.</p> <p>18 - - -</p> <p>19 EXAMINATION</p> <p>20 - - -</p> <p>21 BY MR. CARTER:</p> <p>22 Q. Good morning. Or I suppose</p> <p>23 good early afternoon for you, Professor</p> <p>24 Sidel.</p>

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<p>1 A. Good morning.</p> <p>2 Q. My name is Sean Carter, I'm</p> <p>3 one of the lawyers representing</p> <p>4 plaintiffs in the litigation in federal</p> <p>5 court in New York arising from the</p> <p>6 September 11th attacks.</p> <p>7 The plaintiffs in that</p> <p>8 litigation are family members who lost</p> <p>9 loved ones on 9/11, survivors of the</p> <p>10 attacks, and commercial interests that</p> <p>11 suffered damages as a result of the</p> <p>12 attacks.</p> <p>13 Are you aware of all of</p> <p>14 that?</p> <p>15 A. Yes, in broad terms.</p> <p>16 Q. Our purpose here today is to</p> <p>17 take your deposition in relation to</p> <p>18 opinions you've offered as an expert on</p> <p>19 behalf of some of the defendants.</p> <p>20 Before we begin, have you</p> <p>21 ever been deposed in an American court</p> <p>22 proceeding?</p> <p>23 A. I gave testimony by</p> <p>24 telephone in an immigration case in -- I</p>	<p>1 A. Yes, I do.</p> <p>2 Q. If at any point you don't</p> <p>3 understand one of my questions, please</p> <p>4 simply tell me that.</p> <p>5 Is that okay?</p> <p>6 A. Yes.</p> <p>7 Q. If you need, at any point,</p> <p>8 to take a break, please just let us know</p> <p>9 and we can do that, okay?</p> <p>10 A. Great. Thank you.</p> <p>11 MR. CARTER: I'd like the</p> <p>12 court reporter to mark as</p> <p>13 Exhibit-597 the notice of</p> <p>14 deposition.</p> <p>15 - - -</p> <p>16 (Whereupon, Exhibit</p> <p>17 Sidel-597, No Bates, Notice of</p> <p>18 Oral Deposition of John Sidel, was</p> <p>19 marked for identification.)</p> <p>20 - - -</p> <p>21 BY MR. CARTER:</p> <p>22 Q. Professor Sidel, this is the</p> <p>23 notice of deposition pursuant to which</p> <p>24 you're testifying today.</p>
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<p>1 think it was San Francisco. And I was</p> <p>2 sworn in, and it was matters of fact in</p> <p>3 a -- in terms of background on the</p> <p>4 Philippines.</p> <p>5 Q. What year was that?</p> <p>6 A. It was a couple of years</p> <p>7 ago, yeah.</p> <p>8 Q. Just in case the rules in</p> <p>9 that proceeding were a bit different, I'm</p> <p>10 going to review some of the sort of basic</p> <p>11 guardrails for proceeding today.</p> <p>12 The first is that it's</p> <p>13 important for you to wait until I finish</p> <p>14 my question before you begin to answer.</p> <p>15 And also it's important that I wait for</p> <p>16 you to complete your answer before</p> <p>17 beginning my question.</p> <p>18 Do you understand that?</p> <p>19 A. Yes.</p> <p>20 Q. In addition, the court</p> <p>21 reporter can't take down gestures like</p> <p>22 nods of the head, so it's important for</p> <p>23 you to verbalize all of your answers.</p> <p>24 Do you understand that?</p>	<p>1 Do you understand that this</p> <p>2 is testimony under oath in a formal legal</p> <p>3 proceeding in the United States?</p> <p>4 A. I do.</p> <p>5 Q. And the purpose of your</p> <p>6 deposition is to discuss opinions you've</p> <p>7 offered in a report dated July 29, 2020.</p> <p>8 Do you have that report with</p> <p>9 you?</p> <p>10 A. I have it on the desk with</p> <p>11 me, yes.</p> <p>12 Q. And as I understand it, you</p> <p>13 were asked to prepare that report by</p> <p>14 defendants Muslim World League,</p> <p>15 International Islamic Relief Organization</p> <p>16 and officials associated with this</p> <p>17 organization named Drs. Naseef, Al-Obaid,</p> <p>18 Al-Turki and Adnan Basha; is that</p> <p>19 correct?</p> <p>20 A. Through their lawyers, yes.</p> <p>21 Q. Before your work on this</p> <p>22 case, had you had any prior dealings with</p> <p>23 the Muslim World League?</p> <p>24 A. No.</p>